

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	Civil Action No.: 18-15099 (ZNQ)(LHG)
	:	
v.	:	
	:	
SHANT HOVNANIAN, et al.	:	
	:	
Defendants.	:	

**DECLARATION OF JOHN M. HANAMIRIAN IN SUPPORT OF DEFENDANT VSHPHH
TRUST'S MEMORANDUM OF LAW IN FURTHER SUPPORT OF ITS MOTION FOR
SUMMARY JUDGMENT**

I, John M. Hanamirian, an attorney duly admitted to practice law before the courts of the United States Federal Court for the District of New Jersey, hereby declare under penalty of perjury as follows:

1. I am the principal attorney at Hanamirian Law Firm, P.C., and I have been retained by Defendant VSHPHH Trust to defend and represent its interests in this matter.
2. I submit this Declaration in support of Defendant VSHPHH Trust's Memorandum of Law in Further Support of its Motion for Summary Judgment.
3. Attached hereto as Exhibit "A" is a true and correct copy of a deed reflecting that on January 1, 2015, Vahak S. Hovnanian and Paris H. Hovnanian a/k/a Paris H. Hovnanian transferred title to real property located at 1 Dag Hammarskjold Boulevard, Freehold, New Jersey to the VSHPHH Trust, which was recorded on January 31, 2015.
4. Attached hereto as Exhibit "B" is a true and correct copy of the trust agreement for the VSHPHH Trust.

5. Attached hereto as Exhibit "C" is a redacted copy of the Internal Revenue Agent's, Michael MacGillivray, Report. A Motion to Seal the respective document was filed with the Court on June 13, 2022. (Dkt. 133.)

I, JOHN M. HANAMIRIAN, hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: June 17, 2022

By: John M. Hanamirian

